

## THYSSEN STEEL GROUP EXCLUSION REQUEST

### ATTACHMENT 1 HIGH CARBON HOT-ROLLED STEEL

- (a) The designation of the product under a recognized standard or certification (e.g., ASTM, DIN), or the commercial name for the product and the HTS number under which the product enters the United States.

The merchandise subject to this request is known as high-carbon, hot-rolled steel, pickled and oiled, aluminum killed, fine grain practice, continuous cast and vacuum degassed, according to SAE 1050, modified as per the chemistry in (b) below.

The applicable HTS provision is: 7208.27.0060.

- (b) A description of the product based on physical characteristics (e.g. chemical composition, metallurgical properties, dimensions, surface quality) so as to distinguish the products from products for which exclusion is not sought;

The product described above, modified as per the following chemistry (%):

C	.47 - .55
Mn	.60 - .75
P	.020 max.
S	.020 max.
Si	.10 - .20
Al	.060 max.

Hardness      HRB 92-98

Inclusion content no greater than #2 thin series per ASTM A 45.

Microstructure to be fine perlite with no more than 30% proeutectoid ferrite, no carbide ferrite banding.

Grain size to be rated # 5 or finer as per ASTM E112.

Total surface decarburized not to exceed 0.003”.

- (c) The basis for requesting an exclusion;

Certain high-carbon, hot-rolled steel is produced in the United States only in limited quantities. The high-carbon HRC purchased by ITW/CIP has unique chemistry and very special mechanical properties in order to meet stringent standards of the automotive industry. This steel is used in critical

parts (i.e. fasteners) in the manufacture of automobiles. As stated in ITW/CIP's affidavit, they have been unable to find another certified domestic steel producer that can supply the quality they need and they consider it too risky to rely on a single domestic source of supply.

- (d) The names and locations of any producers, in the United States and foreign countries of the product;

The only domestic producer approved by ITW/CIP is WCI in Warren, Ohio.

- (e) Total U.S. Consumption of the product, if any, by quantity and value for each year from 1996 to 2000, and the projected annual consumption for each year from 2001 to 2005, with a basis for the projection;

US Consumption (estimated):

30,000 – 35,000 short tons  
\$17,500,000 (e)

- (f) Total US production of the product for each year from 1996 to 2000, if any;

Thyssen Steel Group is unable to estimate US production.

- (g) The identity of any US produced substitute for the product, total US production of the substitute for each year from 1996 to 2000, and the names of any US producers of the substitute;

Thyssen Steel Group is unaware of any viable substitutes.

## **CONCLUSION**

We understand that the purpose of the USTR investigation is to determine appropriate remedies for the importation of certain steel products, which are produced by the domestic industry. Since our imports have little, if any, impact on domestic producers, we respectfully request that high-carbon hot-rolled steel be excluded from any import restrictions, and that the language of any remedy order for HTS subheadings 7208.27.0060 clearly exclude this product.